

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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2005 FEB -2 P 3:23

SUSAN LANG,
Plaintiff,

v.

LANDMARK SCHOOL, INC.,
Defendant.

C.A. NO. 04-11867-NG

U.S. DISTRICT COURT
DISTRICT OF MASS

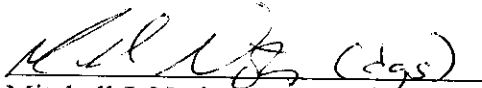
JOINT MOTION TO EXTEND DISCOVERY DEADLINE BY 60 DAYS

The parties jointly move this Court to extend the discovery deadline by sixty (60) days, from February 15, 2005, to April 16, 2005, for the following reasons:

1. This action stems from Plaintiff's former ongoing employment relationship with the Defendant. Plaintiff claims that the Defendants discriminated against her due to her disability.
2. The parties agreed to a very aggressive discovery schedule - three months - which they have found difficult to accommodate. Discovery has proven difficult to complete as the relevant fact pattern spans nearly 10 years and involves numerous documents and witnesses. Also, the Holidays and unrelated litigation events have delayed discovery.
4. The parties are cooperating to meet discovery demands and remain hopeful that the remaining discovery will be completed by April 16, 2005.
5. No party will be prejudiced if the Court allows this Motion.


WHEREFORE, the parties jointly request that this Motion be allowed and that discovery be extended to April 16, 2005.

The Plaintiff,
SUSAN LANG,
By her attorney,
Law Office of Mitchell J. Notis



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The Defendant,
LANDMARK SCHOOL, INC.,
By its attorneys,
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Dated: February 1, 2005

I hereby certify that a copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail *for*
(by hand on 2-1-05)

